



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

SEP 29 2015

Ms. Evita N. Lagard
Administrator, Office of Environmental Compliance
Assessment Division
Louisiana Department of Environmental Quality
Post Office Box 4312
Baton Rouge, LA 70821-4312

Dear Ms. Lagard:

Thank you for your correspondence submitting the Louisiana Department of Environmental Quality's (LDEQ) 2015 annual network assessment. The U.S. Environmental Protection Agency (EPA) has completed its review of the LDEQ's 2015 Annual Monitoring Network Plan to ensure it meets the requirements of 40 Code of Federal Regulations (CFR) Part 58 that are under the oversight of the Regional Administrator. At EPA Region 6, approval authority for annual monitoring network plans is delegated to the Associate Director for Air Programs.

We appreciate your cooperation and work to submit your 2015 network plan. The network assessment process presents an opportunity for the EPA and the LDEQ to collaborate on the air monitoring network design. See 40 CFR Part 58 App. D, 1.1.2. I am pleased to inform you that your 2015 Annual Monitoring Network Plan is approved in accordance with 40 CFR §58.10. Details of our review of the LDEQ 2015 Annual Monitoring Network Plan are provided in the enclosure.

The EPA appreciates the LDEQ's use of the revised Metropolitan Statistical Area definitions and 2014 population estimates from the U.S Census Bureau. We look forward to our continued collaborative work with the LDEQ on your 2016 Annual Monitoring Network Plan. If you have any questions, or if you would like to discuss our comments, please contact me at (214) 665-3102, or your staff may contact Ms. Frances Verhalen, Air Quality Analysis Section Chief, at (214) 665-2172.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Hansen", is written over a light blue horizontal line.

Mark Hansen
Associate Director
for Air Programs

Enclosure

Louisiana Department of Environmental Quality
2015 Annual Monitoring Network Plan Technical Comments

Louisiana's 2015 Annual Monitoring Network Plan (AMNP), dated July 1, 2015, was received on July 6, 2015. This plan will be referred to as the "2015 Plan" throughout the remainder of this document. In accordance with the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices, the U.S. Environmental Protection Agency (EPA) has reviewed the 2015 Plan and our comments are provided below. The comments below reflect the EPA's efforts in collaboration with the Louisiana Department of Environmental Quality (LDEQ) to maintain an accurate and efficient ambient air monitoring network.

General Comments

We appreciate the LDEQ's submittal of the 2015 Plan. We also appreciate the LDEQ's operation of the ambient air monitoring network in accordance with 40 CFR Part 58, including the LDEQ's maintenance of its ambient air monitoring network in accordance with the quality assurance requirements of 40 CFR Part 58, Appendix A, design of the network in accordance with Appendix D, and selection of site locations in accordance with the requirements of Appendix E. Please continue operation and maintenance of your air monitoring network in accordance with 40 CFR Part 58 requirements.

For future plans, at the time the annual monitoring network plan proposal becomes available for public review, we would appreciate if you would send a web link for the proposal by email to Ms. Frances Verhalen at verhalen.frances@epa.gov and to Ms. Ellen Belk at belk.ellen@epa.gov.

Also, for future annual air monitoring network plan submittals, we would appreciate if you would send an electronic version of the plan in addition to the hardcopy. Electronic versions may be sent to Ms. Verhalen and to Ms. Belk at the email addresses above.

Regarding the Air Quality System (AQS) database, thank you for updating the end dates for monitors where applicable since the previous network review.

Volatile Organic Compound (VOC) Special Purpose Monitors (SPMs)

We noticed several VOC SPMs are included in the network plan and would like to clarify whether or not these SPMs need to be included in future plans. The focus of the annual network reviews is on monitors that are federally required or federally funded. All monitors supported by federal funds should continue to be included in annual monitoring network plans; monitors funded by non-federal sources should not be included in the AMNPs.

Specifically, for each of the following VOC SPMs, we request that LDEQ let us know within 30 days from the date of this letter, whether federal funds are used for their operation.

<u>Site Name</u>	<u>AQS Site ID</u>	<u>Pollutant Measured</u>	<u>Station Type</u>
LSU	22-033-0003	VOC	SPM
Carville	22-047-0012	VOC	SPM
French Settlement	22-063-0002	VOC	SPM

Port Allen	22-121-0001	VOC	SPM
Westlake	22-019-0008	VOC	SPM
Chalmette Vista	22-087-0007	VOC	SPM
Lake Charles	SPECIAL3	VOC	SPM
Southern University	22-033-2002	VOC	SPM

We encourage LDEQ to continue operating each of these monitors for toxics and/or ozone precursor data.

In general, for future plans, if these monitors are operated with federal funds, please continue to include them in the AMNP.

Alternately, if these monitors are solely funded by non-federal funds, these monitors should

- not be included in future annual network plans
- not be included in future submittals of the Photochemical Assessment Monitoring Stations (PAMS) Quality Assurance Project Plan (QAPP)
- have end dates entered in AQS.

Please continue to include all monitors that are required for PAMS in the AMNP.

Auxiliary Monitors

Thank you for your December 23, 2014 letter, in which LDEQ notes that it will keep the specified auxiliary decommissioned monitors. We look forward to working with the LDEQ on the future ambient air network and the adequacy of the monitors' siting.

Timeline

Thank you for submitting the timeline of the approved changes on December 23, 2014. Thank you also for including the information regarding the holiday decommissioning schedule.

Near-Road Monitoring Site

New Orleans-Metairie, LA Metropolitan Statistical Area (MSA).

We appreciate the LDEQ initiating Carbon Monoxide (CO) and Particulate Matter of 2.5 Micrometers or Less (PM_{2.5}) monitoring at the New Orleans Near-Road site (AQS Site ID: 22-071-0021) on December 3, 2014. We also appreciate the LDEQ's work in establishing wind speed and wind direction monitoring on February 27, 2015. We look forward to hearing back from you as to the installation date of the traffic counter.

Ozone (O₃) Monitoring

New Orleans-Metairie, MSA.

We note that the end dates in the AQS database for the discontinued O₃ monitors at the City Park site (AQS Site ID: 22-071-0012) and at the Hahnville site (AQS Site ID: 22-089-0003) are December 31, 2014.

Lafayette, LA MSA.

Thank you for your update on setting up the second required ozone site for the Lafayette MSA as per 40 CFR Part 58, Appendix D, 4.1 and Table D-2. We received the final site documentation materials via electronic mail on September 4, 2015, and approved the final site location by letter dated September 8, 2015. We look forward to the official start-up of this ozone site.

Lake Charles, LA MSA.

We note that the end date in the AQS database for the O₃ monitor at the Westlake site (AQS Site ID: 22-019-0008) is December 31, 2014.

Monroe, LA MSA.

Region 6 supports the continued operation of the O₃ monitor at the Monroe site (AQS Site ID: 22-073-0004) to maintain O₃ monitoring coverage for the Northeast regional area.

Nitrogen Dioxide (NO₂) Monitoring

Baton Rouge, LA MSA.

We note that the end date in the AQS database for the NO₂ monitor at the LSU site (AQS Site ID: 22-033-0003) and also for the Carville site (AQS Site ID: 22-047-0012) is December 31, 2014.

Sulfur Dioxide (SO₂) Monitoring

The U.S. EPA Region 6 acknowledges that no changes have occurred in the LDEQ SO₂ monitoring network with the submittal of the 2015 plan. The LDEQ is meeting the network design requirements for ambient air quality monitoring for SO₂. See 40 CFR Part 58, Appendix D Section 4.4.

Lead (Pb) Monitoring

The U.S. EPA Region 6 acknowledges that no changes have occurred in the LDEQ Pb monitoring network with the submittal of the 2015 plan. The LDEQ is meeting the network design requirements for ambient air quality monitoring for Pb. See 40 CFR Part 58, Appendix D Section 4.5.

Baker LSP Site.

We note that last year's response included discussion of continued operation of the Pb monitor at the Baker LSP site. Please keep us informed of the status regarding the demolition and remediation of the nearby Exide Technologies recycling site. Any future request for a system modification under 40 CFR § 58.14 should be submitted to the EPA Region 6. Please provide the appropriate technical analysis for any future planned discontinuation of the monitor.

Particulate Matter (PM) Monitoring

PM Speciation

Shreveport-Bossier City, LA MSA.

According to the EPA's assessment of the Chemical Speciation Network (CSN), the LDEQ is required to install a PM_{2.5} Federal reference method (FRM) or Federal equivalent method (FEM) monitor at the Shreveport Airport site (AQS Site ID: 22-015-0008) for the measurement of CSN mass concentration.

However, the PM_{2.5} supplemental speciation at the Shreveport Airport site was among the low scoring sites in the CSN assessment and could be discontinued. In the 2015 Plan, the LDEQ requests to discontinue supplemental speciation at the Shreveport Airport site (AQS Site ID: 22-015-0008). The request to discontinue AQS Site ID: 22-015-0008 meets system modification requirements under 40 CFR 58.14, and the EPA approves this request. We note that collocation requirements at the Shreveport Calumet site continue to be met. See 40 CFR 58, Appendix A, 3.2.5.1(b).

Particulate Matter of 2.5 Microns or Less (PM_{2.5})

Thank you for including the PM_{2.5} end dates for Monroe, Alexandria and Port Allen in the 2015 Plan.

New Orleans-Metairie, LA MSA.

Thank you for updating the Kenner site PM_{2.5} FRM operating schedule in Table B of the 2015 Plan. See 40 CFR §58.12(d)(1)(ii).

Baton Rouge, LA MSA.

Thank you for including the PM_{2.5} Port Allen site AQS ID in Table B of the 2015 Plan. Also, we note that the request to discontinue the PM_{2.5} FRM monitor at the Bayou Plaquemine site (AQS Site ID: 22-047-0009) was approved in response to a request in LDEQ's 2014 Annual Network Plan. The AQS database shows an end date of 12/31/14, while the 2015 Plan shows that the Bayou Plaquemine PM_{2.5} monitor was discontinued on 1/27/15. Please clarify the discrepancy in The 2016 Plan.

Lake Charles, LA MSA.

For the Lake Charles MSA, following up on discussion in last year's plan (2014 Plan) regarding the Lake Charles McNeese University site (AQS Site ID: 22-019-0010), we note that AQS shows the discontinuance of the PM_{2.5} FRM on 12/31/2014, while the 2015 Plan indicates the monitor was discontinued on 1/23/15. Please clarify the date of discontinuation for the PM_{2.5} site (AQS Site ID: 22-019-0010) in The 2016 Plan. We appreciate the LDEQ's continued operation of the PM_{2.5} tapered element oscillating microbalance (TEOM) in the Westlake area (AQS Site ID: 22-019-0008).

Alexandria LA MSA.

For the PM_{2.5} FEM Beta Attenuation Monitors (BAMs) at the Alexandria site (AQS Site ID: 22-079-0002), following up on discussion in last year's review (2014 Plan), we appreciate that the LDEQ updated AQS to show the BAMs were discontinued on 9/30/14. We note that the FRM at this location is still running.

Monroe, LA MSA.

For the PM_{2.5} monitoring site at Monroe (AQS Site ID: 22-073-0004), following up on discussion in last year's review (2014 Plan), we appreciate that the LDEQ updated AQS to show the BAM was discontinued on 9/30/14. We note that the FRM at this location is still running.

Particulate Matter of 10 Microns or More (PM₁₀)

Lafayette, LA MSA.

The primary PM₁₀ BAM Parameter Occurrence Code – 1 (POC-1) is required to meet the minimum PM₁₀ network requirements for the Lafayette MSA. We note that AQS shows that the POC-2 was discontinued on 12/13/14, while the 2015 Plan indicates that the PM₁₀ BAM POC-2 was discontinued on

1/23/15. Please clarify the date of discontinuation for PM₁₀ BAM POC-2 site (AQS Site ID: 22-055-0007) in the 2016 Plan. Also for next year's plan, please include reference to POC-1 in Table B.

